

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**IN RE:**

**SHACKARAH S. VERA**

**Debtors**

**FREEDOM MORTGAGE CORPORATION**

**Movant**

**v.**

**SHACKARAH S. VERA**

**MAUREEN A. ROSE (Non-Filing Co-Debtor)**

**Respondents**

**:**

**:**

**:**

**:**

**BK. No. 20-10823-elf**

**Chapter No. 13**

**11 U.S.C. §362 AND §1301**

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO  
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **FREEDOM MORTGAGE CORPORATION**. The property address is 10 SHIPLEY PLACE, PHILADELPHIA, PA 19152, loan number ending 8185. A Proof of Claim has been filed on the claim register at #7. A written/unwritten Notice of payment change/forebearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b ) and Local Rule 20-3007.

3. The terms of the forbearance are as follows: Regular monthly mortgage payments starting with the April 1, 2020 through June 30, 2020 are suspended. No fee shall be assess against the loan in consideration of the forbearance. Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into a Loss Mitigation Program; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan. A copy of the Forbearance Agreement is attached hereto as exhibit "A".

4. Creditor, at this time, does not waive any rights to collect the payments that come due

during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$1,270.28. Furthermore, Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31625

Fax Number: 215-568-7616

Email: [jerome.blank@phelanhallinan.com](mailto:jerome.blank@phelanhallinan.com)

May 8, 2020

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>IN RE:</b>	:	
<b>SHACKARAH S. VERA</b>	:	<b>BK. No. 20-10823-elf</b>
<b>Debtors</b>	:	
	:	<b>Chapter No. 13</b>
<b>FREEDOM MORTGAGE CORPORATION</b>		
<b>Movant</b>		
<b>v.</b>		
<b>SHACKARAH S. VERA</b>		
<b>MAUREEN A. ROSE (Non-Filing Co-Debtor)</b>		<b>11 U.S.C. §362 AND §1301</b>
<b>Respondents</b>		

**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 8, 2020.

WILLIAM C. MILLER, ESQ.  
CHAPTER 13 TRUSTEE  
P.O. BOX 1229  
PHILADELPHIA, PA 19105

SHACKARAH S. VERA  
10 SHIPLEY PLACE  
PHILADELPHIA, PA 19152

JOHN L. MCCLAIN  
JOHN L. MCCLAIN AND ASSOCIATES  
P.O. BOX 123  
NARBERTH, PA 19072-0123

MAUREEN A. ROSE  
10 SHIPLEY PLACE  
PHILADELPHIA, PA 19152

UNITED STATES TRUSTEE  
OFFICE OF THE U.S. TRUSTEE  
200 CHESTNUT STREET  
SUITE 502  
PHILADELPHIA, PA 19106

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31625

Fax Number: 215-568-7616

Email: [jerome.blank@phelanhallinan.com](mailto:jerome.blank@phelanhallinan.com)

May 8, 2020

# **EXHIBIT A**



PO Box 50485, Indianapolis, IN 46250-0485

JOHN L MCCLAIN AND ASSOCIATES, JOHN L MCCLAIN  
PO BOX 123,  
NARBERTH, PA 19072

05/01/20

Re: SHACKARAH S VERA  
Case Number: 2010823  
Account Number: [REDACTED]

**IMPORTANT NOTICE: TO THE EXTENT THE BORROWER'S OBLIGATION HAS BEEN DISCHARGED IN BANKRUPTCY, IS SUBJECT TO THE AUTOMATIC STAY OR IS PROVIDED FOR IN A CONFIRMED PLAN, THIS COMMUNICATION IS FOR REGULATORY COMPLIANCE AND/OR INFORMATIONAL PURPOSES ONLY, AND DOES NOT CONSTITUTE A DEMAND FOR PAYMENT OR AN ATTEMPT TO IMPOSE PERSONAL LIABILITY FOR SUCH OBLIGATION.**

Dear Attorney,

Your client(s) initiated contact with us recently requesting a forbearance of mortgage payments as a result of impact due to the COVID-19 emergency. Therefore, Freedom has granted a forbearance on the account beginning on April 1, 2020 through and including June 30, 2020, in accordance with the CARES Act.

Due to your client's active status in bankruptcy, we are writing to ensure that, as counsel for the debtor, your client has made you aware of this forbearance request and Freedom's agreement to grant this request. We also want to ensure that you will take all actions that are necessary to address this forbearance in the bankruptcy case, as may be applicable.

We have enclosed an authorization form seeking your consent to allow Freedom and/or Freedom's representatives to continue to communicate directly with Freedom or its representatives regarding this forbearance, and any further potential loss mitigation options.



PO Box 50485, Indianapolis, IN 46250-0485

Upon receipt of this notice, please contact Freedom's designated bankruptcy counsel to confirm receipt, and to ensure that the lines of communication remain open so that we may work through this matter together.

Sincerely,

Bankruptcy Department  
Freedom Mortgage Corporation

cc: Borrower Name(s)  
FMC BK Counsel



PO Box 50485, Indianapolis, IN 46250-0485

AUTHORIZATION TO COMMUNICATE WITH DEBTOR(S)  
REGARDING POTENTIAL LOSS MITIGATION OPTIONS

Loan Number [REDACTED]  
Collateral Address 10 SHIPLEY PL  
PHILADELPHIA PA 19152  
Debtor(s): SHACKARAH S VERA  
Case: 2010823

Freedom Mortgage Corporation (“Freedom”) is the mortgage loan servicer for the above-referenced loan. The debtor(s), identified above, are in an active bankruptcy.

At the Debtor(s) request, through outreach to Freedom, due to a hardship experienced as a result of the COVID-19 crisis, Freedom Mortgage has granted the debtor(s) a forbearance, from April 1, 2020 until June 30, 2020, (the “forbearance period”).

Debtor’s counsel JOHN L MCCLAIN AND ASSOCIATES, JOHN L MCCLAIN hereby authorizes Freedom and/or its agents to communicate directly with debtors during the forbearance period and thereafter, as reasonable and necessary, for the purposes of discussing potential loss mitigation options and general loan account information. Such authorized communications shall not constitute a violation of the automatic stay.

Firm Name: \_\_\_\_\_

Firm Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Authorized Representative: \_\_\_\_\_

Contact Information: \_\_\_\_\_ (telephone)  
\_\_\_\_\_ (email)  
\_\_\_\_\_ (other)

Signature: \_\_\_\_\_